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6 Attorney for Plaintiff and Cross-Defendant
7 CHURCH OF SCIENTOLOGY OF CALIFORNIA

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10 CHURCH OF SCIENTOLOGY OF)
11 CALIFORNIA, a California)
12 Corporation,)
13 Plaintiff,)

14 vs.)

15 GERALD ARMSTRONG, et al.,)
16 Defendants.)

Case No. C 420 153

[SEVERED ACTION]

INTERROGATORIES ACCOMPANYING
REQUEST FOR ADMISSIONS
[C.C.P. § 2030]

17 GERALD ARMSTRONG,)
18 Cross-Complainant,)

19 vs.)

20 CHURCH OF SCIENTOLOGY OF)
21 CALIFORNIA, a California)
22 Corporation, L. RON HUBBARD,)
23 CHURCH OF SCIENTOLOGY)
24 INTERNATIONAL, RELIGIOUS)
25 TECHNOLOGY CENTER, et al.)

26 Cross-Defendants)
27)
28)

Case No. C 420 153

[SEVERED ACTION]

INTERROGATORIES ACCOMPANYING
REQUEST FOR ADMISSIONS
[C.C.P. § 2030]

1 TO: ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:
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4 Plaintiff and cross-defendant, CHURCH OF SCIENTOLOGY OF CALIFORNIA,
5 a California corporation, hereby requests that defendant and
6 cross-complainant, GERALD ARMSTRONG, answer under oath, pursuant to Code
7 of Civil Procedure, Section 2030, within thirty (30) days, the following
8 Interrogatories.

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10 INSTRUCTIONS

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12 1. The following Interrogatories refer to plaintiff's and cross-
13 defendants Request for Admissions (first and third sets) dated August 12,
14 1983, and served concurrently herewith.

15 2. The following Interrogatories call for information not merely
16 within your personal knowledge, but any information obtainable by you,
17 including information in the possession of anyone acting on your behalf,
18 such as your attorneys, investigators and their representatives, agents,
19 assistants or sources of information.

20 3. The term "describe in complete detail and with particularity" as
21 used herein means:

22 (a) When all or any part of any Request for Admissions is not
23 admitted, the specific aspects of that Request which are not admitted
24 must be responded to;

25 (b) Identify, as explained in Instructions 4 and 5, each and
26 every document which states, implies or supports your answer;

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1 (c) Identify, as explained in Instructions 6 and 7, each and
2 every individual and/or entity who has provided you information relating
3 to, concerning or supporting your answer.

4 4. The term "document" as used herein means, without limitation, the
5 following items, whether printed or recorded or reproduced by any other
6 mechanical process, including audio and/or visual process, or written or
7 produced by hand: agreements, communications, city, state and/or federal
8 governmental proceedings and hearings, transcripts and reports,
9 correspondence, telegrams, memoranda, summaries or records of telephone
10 conversations or interviews, diaries, graphs, reports, notebooks, note
11 charts, plans, summaries or records of meetings or conferences, summaries
12 or reports of investigations or negotiations, opinions or reports of
13 counsel, consultants, photographs, tape recordings, cassettes, motion
14 picture or television films, brochures, pamphlets, advertisements,
15 circulars, press releases, articles, or any publications, drafts, files,
16 letters, any marginal comments appearing on any document, computer
17 printouts and all other writings, or printed materials. If any document
18 was, but is no longer, in plaintiff's possession, custody or control,
19 state what disposition was made of it and where it may be located, and
20 identify it in the manner set forth below.

21 Documents referred to in these Interrogatories are to documents in
22 the form and condition they are in on the day these Interrogatories are
23 served, including all comments, notes, remarks or other material which
24 may have been added subsequent to their initial preparation.

25 5. The term "identify" (or "identity") as used herein with
26 reference to a document means, without limitation, that the following

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1 information shall be provided: (a) type of document (e.g., letter, tape,
2 cassette, newspaper article, etc.); (b) the date of preparation and/or
3 publication; (c) the name, business affiliation and last known address of
4 the person or persons who prepared it and of the person or persons who
5 signed it or over whose name it was issued; (d) the name, business
6 affiliation and last known address of all persons or entities receiving a
7 copy of it; (e) the substance and/or subject matter of the document; (f)
8 the portion(s) which bears upon the Interrogatory to which the document
9 is responsive; (g) the current location of the document and the identity
10 of its custodian(s); (h) whether you will voluntarily make the document
11 available for inspection and copying.

12 You may, in lieu of providing this identifying information, provide
13 a copy of the document itself. For each Interrogatory which requests a
14 document which is not attached to plaintiff's answers, the information
15 set forth above should be provided as part of the answer to that
16 Interrogatory.

17 6. The term "identify" (or "identity") as used herein with
18 reference to an individual means to state his or her full name, business
19 affiliation, last known address and telephone number, and including the
20 date as of which the last known address was known to you. If you do not
21 have the full address, provide any portion thereof which is known (e.g.,
22 street name, city).

23 7. The term "identify" (or "identity") as used herein with
24 reference to a corporation, partnership, association or any other entity
25 means to state its name, last known address and telephone number, any

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1 other names under which the entity has or is doing business and any
2 fictitious business names. Include the date as of which the last known
3 address was known. If you do not have the full address, provide any
4 portion thereof which is known.

5 8. If you cannot answer an Interrogatory in full, after exercising
6 due diligence to secure the information to do so, so state, and answer to
7 the extent possible, stating your reason for not being able to answer the
8 remainder, and stating whatever information or knowledge you do have
9 concerning the unanswered portion.

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11 DATED: August 12, 1983

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13 Trabish & Peterson

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16 By s/ John Peterson
17 John G. Peterson
18 Attorney for Plaintiff and
19 Cross-Defendant, CHURCH OF
20 SCIENTOLOGY OF CALIFORNIA
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2 INTERROGATORIES
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4 If your response to any of plaintiff's and cross-defendant's
5 Requests for Admissions (Sets No. 3 and 1) served herewith was anything
6 except an unqualified admission, please identify each such Request for
7 Admissions by number, and as to each such Request for Admissions which
8 you did not unqualifiedly admit, please state in complete detail and with
9 particularity all facts upon which you base the denial or partial denial.
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